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9 *Attorneys for Adam Pacheco*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12
13 UNITED STATES OF AMERICA,
14
Plaintiff,
15
vs.
16
ADAM PACHECO,
17
Defendants.

CASE NO. 2:19-CR-00248-KJD-DJA

**STIPULATION AND ORDER FOR
MODIFICATION OF PRETRIAL
RELEASE CONDITIONS**

18
19 IT IS HEREBY STIPULATED AND AGREED by and between Christopher Burton,
20 Supervisory Assistant United States Attorney; and Kathleen Bliss, Esq., and Jacqueline
21 Tirinnanzi, Esq., counsel for Defendant Adam Pacheco, that this Court's order modifying Mr.
22 Pacheco's pretrial release, (ECF No. 57), which allows him to travel freely within the continental
23 United States, be modified to allow Mr. Pacheco also to travel to Hawaii for the purpose of
24 assisting and winding down his elderly and ill mother's business affairs in Hawaii.

25
26 The stipulation is entered for the following reasons:

- 27 1. On July 2, 2020, this Court granted Mr. Pacheco's motion for unrestricted travel
28

1 within the continental United States. (ECF No. 52, 57).

2 2. On February 7, 2022, Mr. Pacheco advised that his mother, for whom he cares
3 and assists, last week fell and broke several bones. She is still hospitalized in Las Vegas, Nevada,
4 at Centennial Hospital. During this hospitalization, she was diagnosed with terminal cancer.

5 3. Mr. Pacheco is her oldest son. He, like his mother, was born in Honolulu, Hawaii.
6 His mother, nee Helenihi, has still has family business in Hawaii, including real estate holdings.
7 Mr. Pacheco must travel to Hawaii on behalf of his mother to settle and sell or liquidate her
8 assets in Hawaii as she instructs him. She is unable to travel to Hawaii because of her medical
9 condition and, given her recent diagnosis, will unlikely be able to do so in the future.
10

11 4. Mr. Pacheco surrendered his passport at the time of his pretrial release on October
12 7, 2019. He have been in full compliance with all orders imposed by this Court. Trial is currently
13 set to commence on October 31, 2022. (ECF No. 78).

14 5. Mr. Pacheco is fully vaccinated and therefore satisfies all travel restrictions to
15 Hawaii at this time.

16 6. Mr. Pacheco will report his travel to Hawaii if ordered by this Court, but
17 respectfully requests travel to and from Hawaii without prior approval or authorization. All other
18 conditions of pretrial release shall remain in full effect.
19

20 7. The United States does not oppose Mr. Pacheco's request and so stipulates to an
21 order modifying his current release order.
22

23 Dated this 8th day of February 2022.
24

25 /s/Christopher Burton
26 Supervisory Assistant U.S. Attorney
27 Counsel for the United States
28

/s/Kathleen Bliss
Counsel for Adam Pacheco

ORDER

Based upon the stipulation of the parties, which demonstrates good cause, IT IS HEREBY ORDERED, that the previously imposed conditions of pre-trial release be modified and that Mr. Pacheco is hereby allowed to travel without prior approval or authorization of this Court to Hawaii, in addition to his travel throughout the continental United States. All other conditions of pretrial release shall remain in full effect.

DATED: February 10, 2022



THE HONORABLE NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE